

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN	§	
AMERICAN CITIZENS, <i>et al.</i>	§	
	§	
<i>Plaintiffs,</i>	§	Case No. 3:21-cv-00259
V.	§	[Lead Case]
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	
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TEXAS STATE CONFERENCE OF	§	
THE NAACP,	§	
	§	
<i>Plaintiff,</i>	§	Case No. 1:21-cv-01006
V.	§	[Consolidated Case]
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	
<hr/>		

PLAINTIFF TEXAS NAACP’S PRETRIAL DISCLOSURES

Plaintiff Texas NAACP hereby submits the following Pretrial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court’s Pretrial Scheduling Order (Dkt. 880). Texas NAACP reserves the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants Pretrial Disclosures, as appropriate.

I. WITNESSES

Texas NAACP’s Witness List is set forth in **Exhibit A** attached hereto. Texas NAACP reserves the right to call witnesses identified by Defendants or any other Plaintiff in their Pre-Trial Disclosures. Texas NAACP does not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial. Accordingly, Texas NAACP reserves

the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments, including without limitation the right to: (1) call its witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on Defendants' witness list and any witness necessary to rebut Defendants' case, arguments, and/or evidence, and/or to authenticate or lay the foundation for the introduction of documents to which Defendant objects; (4) reasonably supplement or amend this Witness List through and including the time of trial to the extent permitted by the Court; (5) introduce deposition testimony as impeachment evidence; or (6) change a witness from a live witness to a witness testifying by deposition, and vice versa. Texas NAACP also reserves the right to supplement or modify this witness list in response to rulings made by the Court. Texas NAACP's identification of any witness listed herein is not an admission that the witness's testimony would be admissible if proffered by Defendants.¹

II. TRIAL EXHIBITS

Texas NAACP's Preliminary Trial Exhibit List is set forth in **Exhibit B** attached hereto. Texas NAACP reserves the right to introduce in evidence any documents identified by Defendants or any other plaintiff in their Pre-Trial Disclosures and to introduce additional documents as rebuttal or impeachment evidence. Texas NAACP's list of trial exhibits may include documents that are the subject of one or more pending motions. Texas NAACP reserves the right to amend its list of trial exhibits based on the outcome of those pending motions.

Texas NAACP's list of trial exhibits does not include demonstrative exhibits, which will be identified and exchanged at a mutually agreeable time prior to trial. Texas NAACP will serve

¹ Pursuant to the parties' agreement, the parties will exchange deposition designations as required under Federal Rule of Civil Procedure 26(a)(3) for any witnesses testifying by deposition on May 7, 2025.

its objections to Defendants' trial exhibit list and any additional trial exhibits in accordance with the Court's Pretrial Scheduling Order.

Respectfully submitted,

/s/ Lindsey B. Cohan

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plans

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ATTORNEYS FOR THE TEXAS STATE
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing and all attachments were filed and served on counsel of record via the Court's electronic filing system on May 2, 2025.

s/ Lindsey B. Cohan
Lindsey B. Cohan
Counsel for Plaintiff Texas NAACP